1. On or about March 24, 2025, in Maricopa County Arizona, Charlene Jackson-Etnire, did submit a written application for a civil harassment restraining order, from the Mesa City Court, executed under the penalty of perjury, in which she did willfully and knowingly state material matter to which she did not believe to be true.

2. It was material to the proceeding as described in paragraph 1.

3. On or about March 24, 2025, Charlene Jackson Etnire, while under oath as a party to a case Jackson v Gerlach, knowingly submitted a false statement with respect to a material issue by claiming she never issued a ruling based on a "gut feeling" or "gut reaction" and never expressed having a "personal interest" in a case.

4. The aforesaid statement in the application signed and submitted by Charlene Jackson Etnire, as she then and there well knew and believed, was false in that she did in fact make those statements while presiding over a domestic relations case in 2024. A licensed attorney and their client attested to those very statements in a successful Motion for a Change of Judge, which can be found on the public record.

   The fact that the Motion was granted—combined with Judge Charlene Jackson's failure to report the attorney to the State Bar, as required under the Code of Judicial Conduct if she genuinely believed the attorney was dishonest—further corroborates the accuracy of the public record. Additionally, the For The Record ("FTR") courtroom audio was either trimmed or erased, indicating deliberate concealment of judicial misconduct by removing evidence from the official record.

   Screenshots from the Motion for Change of Judge confirm that Judge Jackson denied a motion based on a "gut reaction," admitted to having a "personal interest" in the case, and tampered with the FTR recording system to hide her actions. After Erin Gerlach publicly exposed this misconduct, Jackson retaliated by labeling Gerlach a "liar" and "conspiracy theorist." This defamatory framing was used to justify a civil harassment restraining order, which falsely claimed that none of the misconduct occurred and that Jackson never made the statements in question. By weaponizing the restraining order process against Erin Gerlach, Judge Jackson violated Gerlach's First Amendment rights and further demonstrated a pattern of abuse, dishonesty, concealment, and unconstitutional retaliation.

While it is true we believe Judge Jackson erred by not staying the case to await a ruling that may moot this entire action, her comments to counsel and Petitioner were punitive, petty, and ignored reality demonstrating her bias and prejudice. Specifically, Judge Jackson's bias was revealed in her attack upon both counsel and Petitioner where she stated she had a "gut reaction" that Petitioner planned this out to buy time for the juvenile court decision

to stop the family court from moving forward. Judge Jackson stated that undersigned counsel's illness seemed "fortuitous" despite the fact he provided a doctor's note and was suffering from severe symptoms (vomiting, diarrhea, fever, etc.). During the contempt trial, counsel had to requests breaks because of his symptoms and borderline fever. Additionally, Judge Jackson denied Petitioner's co-counsel the ability to speak or participate without reason, placing the full load of the trial on Petitioner's ill attorney. Such a comment impugns the integrity and impartiality of the judiciary in violation of the Code and merits review by the judiciary.

44. Jackson stated, on the record, that she had a "gut reaction" that my attorney's illness was somehow planned out for the purpose of stalling the proceedings to

until after the juvenile court ruling in order to stop the family court from moving forward.

45. She stated that my attorney's illness seemed "fortuitous." I find such comments shocking, especially from someone who supposedly has the demeanor and skill to sit in judgment of others.

46. My attorney provided Judge Jackson a verifying note from his healthcare professional and it was patently obvious he was suffering from severe symptoms (vomiting, diarrhea, fever, etc.) brought on by the virus.

55. Following conclusion of the two-day trial, on August 15, 2024 at approximately 2:52pm, while discussing the scheduling of final trial dates, Judge Jackson stated "she had a personal interest" in seeing my case through final trial and rushed the scheduling of my final trial before my case would be ripe, and did so against her divisions preferred trial scheduling protocol. Jackson's expressed statement of having a "personal interest" in any aspect of my case is deeply concerning.

(g) In effort to confirm Jackson's expressed statements of having a personal interest, I ordered the FTR audio from the proceedings. Unfortunately, the final two minutes of the FTR audio seemed to be erased or trimmed. I contacted the Maricopa County Superior Court

and was connected with Kenneth Crenshaw, Deputy Department Administrator, of the Superior Court, confirmed that despite the trial Minute Entry listing an off the record time of 2:52 pm. The FTR audio for both recording system showed an end of recording time as 2:49:44 and 2:50:58, respectively and was unable to account for the missing two minutes from the recordings, which would have likely included Jackson's statements of a personal interest. These discrepancies are highly concerning.

Again, this is not a mere few disgruntled litigants, and the Court should not dismiss the serious nature of these allegations. The consistency of these complaints, particularly the references to Judge Jackson's failure to protect children, her

arbitrary decision-making, and her apparent personal motives in handling family law cases, mirrors her actions in the case at issue. This further supports the contention that there is a broader systemic problem and one that is impugning the integrity of the Superior Court in an ongoing fashion. Petitioner intends to participate in any investigation conducted by the legislature moving forward.